

REMARKS

Claims 12-15, 18, and 19 are pending in the subject application.

Applicants have amended claims 12-15, have canceled claims 1-11, 16, and 17, and have added new claims 18 and 19. These changes do not introduce any new matter.

Rejection Under 35 U.S.C. § 112

In light of the cancellation of claims 1, 3, and 4, the rejection of these claims under 35 U.S.C. § 112, second paragraph, is moot.

Rejection Under 35 U.S.C. § 101

Applicants respectfully request reconsideration of the rejection of claims 4-6, 9, 13, 15, and 16 under 35 U.S.C. § 101 as being directed toward non-statutory subject matter (as note above, Applicants have canceled claims 4-6, 9, and 16). Applicants have amended apparatus claims 13 and 15 to specify features that are not merely software per se. Accordingly, Applicants submit that claims 13 and 15 now define statutory subject matter under 35 U.S.C. § 101, and request that the rejection of these claims thereunder be withdrawn.

Rejection Under 35 U.S.C. § 102

Applicants respectfully request reconsideration of the rejection of claims 1-7, 10-15, and 17 under 35 U.S.C. § 102(b) as being anticipated by *Anderson et al.* (“*Anderson*”) (US 6,839,059 B1) (as noted above, Applicants have canceled claims 1-7, 10, 11, and 17). As will be explained in more detail below, the *Anderson* reference does not disclose each and every feature of independent claims 12-15, as amended herein.

Applicants have amended independent claim 12 to define a display data processing method that includes selecting addition of a watermark to an image element of a content file, and generating a single package file from the content file, a layout control file for controlling a layout of the image element, and control data used for removing the watermark. The content file is stored in a first section of the package file, the layout control file is stored in a

second section of the package file, and the control data is stored in a third section of the package file. Applicants have amended independent claim 13, which defines a display data processing apparatus that corresponds to the method to defined in claim 12, along the same lines that claim 12 has been amended.

The *Anderson* reference does not disclose either selecting the addition of a watermark to an image element of a content file or control data used for removing the watermark. Thus, for at least these reasons, the *Anderson* reference does not disclose each and every feature of claims 12 and 13, as amended herein.

Applicants have amended independent claim 14 to define a display data processing method that includes reading a package file storing content data in which a watermark is added to an image element thereof, in a first section thereof, layout control data for controlling a layout of the image element in a second section thereof, and control data in a third section thereof. The method further includes removing the watermark from the content data and displaying the content data under the control of the layout control data, when the control data stored in the third section indicates an appropriate value. Applicants have amended independent claim 15, which defines a display data processing apparatus that corresponds to the method to defined in claim 14, along the same lines that claim 14 has been amended.

The *Anderson* reference does not disclose, among other features, reading a package file storing content data in which a watermark is added to an image element thereof, in a first section thereof. The *Anderson* reference also does not disclose removing the watermark from the content data and displaying the content data under the control of the layout control data, when the control data stored in a third section indicates an appropriate value. Thus, for at least these reasons, the *Anderson* reference does not disclose each and every feature of claims 14 and 15, as amended herein.

Accordingly, independent claims 12-15, as amended herein, are patentable under 35 U.S.C. § 102(b) over *Anderson*.

Rejection Under 35 U.S.C. § 103

In light of the cancellation of claims 8 and 9, the rejection of these claims under 35 U.S.C. § 103(a) as being unpatentable over *Anderson* is moot.

New Claims

As noted above, Applicants have added new claims 18 and 19, which depend from claims 14 and 15, respectively. Claims 18 and 19 are believed to be patentable under 35 U.S.C. §§ 102 and 103 over *Anderson* for at least the reason that they depend from either claim 14 or claim 15.

Conclusion

In view of the foregoing, Applicants respectfully request reconsideration and reexamination of claims 12-15, as amended herein, and examination of claims 18 and 19, and submit that these claims are in condition for allowance. Accordingly, a notice of allowance is respectfully requested. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at **(408) 749-6902**. If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees to Deposit Account No. 50-0805 (Order No. NGBCP008).

Respectfully submitted,
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